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Program Management

Reply To
Attn Of: HW-124

Ms. Lisa Green, Manager
Environmental Restoration Program
U. S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: Preliminary Scoping Track 2 Summary Report for Central Facilities Area Operable Unit 4-06

Dear Ms. Green:

The U.S. Environmental Protection Agency (EPA) has reviewed the Preliminary Scoping Track 2 Summary Report for Central Facilities Area Operable Unit 4-06 (Track 2 Summary Report) and is providing the attached comments.

EPA concurs with the Idaho Department of Health and Welfare, Division of Environmental Quality (IDHW-DEQ) in that the poor quality of the data does not justify a no further action decision for any of the three sites. EPA also suggests that removal actions be evaluated for all three areas in light of the high concentrations of contaminants of concern found in each of the areas.

If you have any questions please contact me at (206) 553-6903.

Sincerely,

Howard Orlean

Howard Orlean
WAG 4, Remedial Project Manager

cc: w/attachment
Alan Dudziak, DOE-ID
Shawn Rosenberger, IDHW-DEQ (Idaho Falls)
Dean Nygard, IDHW-DEQ (Boise)
Wayne Pierre, HW-124

General Comment

The poor quality of the data collected during this investigation, suggests that many of the sites may need to be resampled during the comprehensive remedial investigation (or at any other opportunistic time prior to making remedial decisions). However, EPA believes that based on screening levels presented in this Track 2 Summary Report, DOE should investigate the feasibility of removal actions at each of the sites.

Several items highlighted in the Track 2 Summary Report regarding the data quality suggests that DOE and it's contractors must be more careful in following correct quality assurance/quality controls procedures during sampling and analyses.

Specific Comments:

1. Page v, Executive Summary, First Bullet, Last Sentence --

Please explain the use of the term "CFA baseline screening level". Is this the 10^{-6} threshold risk level?

2. Page v, Executive Summary, Second Bullet, Last Sentence --

How can the statement be made that "none of the contaminants of concern has a risk greater than 10^{-6} when the data is of such low quality?

3. Section 2, CFA-06 Lead Shop, Page 8, Last Bullet --

The rationale behind the decision to use both XRF and SW-846 methods should be explained here. (i.e. Was XRF just used as a screening tool?) According to footnote c of Table 1 (Page 9) it appears that grab samples are being used to calibrate the XRF. Are these calibrated samples then used in the risk analysis or are additional confirmatory grab samples used?

4. Page 10, Section 2.1.3.1, Last Bullet --

Was the decision to use 90 mg/kg as the level at which the hotspot investigation would cease an arbitrary one made by the WAG-4 managers or was there a technical rationale behind this decision? If there was a technical rationale then that rationale should be explained here.

5. Page 31, Figure 6 --

Footnote "a" indicates that antimony will be included in the removal action for lead. What would be the impacts (if any) on the removal action in terms of the estimate quantity of soil removed with the addition of the antimony? If there is much of an impact would it be necessary to remove additional soil if as indicated on this figure the antimony is of low qualitative risk?

6. Page 40, Bullet at Bottom of Page & Page 41, Bullet at Top of Page --

As both the lead data and the antimony data do not meet the accuracy requirements, EPA suggests that this area be resampled.

7. Page 42, Bottom of Page & Page 43, Top of Page --

Due to what appears to be malfunctions with the XRF probe, the Level II data for the Lead Storage Area should not be used and this area should be resampled.

8. Pages 55 thru 57, CFA-44 Spray Paint Booth Drain --

The data from this area is extremely limited and of questionable quality and therefore no decisions can be made regarding the need for remedial action in this area. There is no sampling evidence to suggest that the amount of contaminants of concern be qualitatively characterized as low. Figure 11 is somewhat misleading in suggesting that the data should be characterized as "medium reliability".